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February 21, 2024

Via ECF

Hon. Mae A. D'Agostino
U.S. District Judge
445 Broadway
Albany, NY 12207

**Re: Arnold v. Town of Camillus et. al.,
Civil No.: 5:20-cv-1364**

Dear Judge D'Agostino:

First, please accept our condolences to you and the court family on the passing of Judge Sharpe. I know he will be missed by us all.

This firm represents Patricia Arnold in the above-referenced action. We write to request an extension of time to complete the two remaining EBTs in this matter of Defendants Flood and James.

We were unable to successfully arrange and conduct the two remaining depositions of Joy Flood and Steven James within the time allocated by the court. The difficulties have been due to our availability because of three trials schedules, the Plaintiffs availability, and the schedules of the Defendants' counsel and witnesses. We completed a trial from February 5th through the 14th. While we had Defendant James scheduled for 3 pm on February 15th, we were unable to proceed on that date due to Plaintiff's medical appointment. Despite several discussions and dates offered, defense counsel has indicated they will object to any extension request and thus will not confirm or refuse our latest offered dates of March 27, 28, or 29th.

We have offered the dates of March 27th, 28th, and 29th which immediately follow our trial before Judge Hurd, commencing March 18th. Additionally the Plaintiff is unavailable as attending Police Academy Training the first two weeks of March. Accordingly, we request that the court grant a sufficient extension of time to complete these two depositions which can be completed in one day if both appear.

I regret the inconvenience and thank you for your attention to this matter.

Respectfully,

/s A.J. Bosman, Esq.

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